

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

JANE DOE No. 101,

Plaintiff,

v.

MORGAN A. SETO, STANLEY SETO,  
LORRAINE CECERE SETO, and  
CITY OF BOSTON,

Defendants.

---

C.A. NO.:

**NOTICE OF REMOVAL**

The Defendant, City of Boston, by and through its undersigned counsel, hereby gives notice of removal of this action pursuant to 28 U.S.C. §§ 1441, 1446, and Local Rule 81 of the United States District Court for the District of Massachusetts from the Suffolk County Superior Court, where this action is currently pending. In the Suffolk County Superior Court, the case is docketed as Civil Action No.2284CV00603 (“State Court Action”), and bears the same caption as above.

**CASE BACKGROUND AND GROUNDS FOR REMOVAL**

1. On March 16, 2022, Plaintiff filed the State Court Action, asserting nine (9) counts against four Defendants: the City of Boston, Morgan A. Seto, Stanley Seto, and Lorraine Cesere Seto.

2. Plaintiff’s first two counts assert federal claims against the City of Boston. Count one (1) asserts a violation of 42 U.S.C. §§ 1983, 1988, and Count two (2) asserts a violation of Title IX, under 20 U.S.C. § 1681-1686.

3. As required by 28 U.S.C. § 1446(a), attached as Exhibit 1 is a copy of the pleading in the State Court Action. The City of Boston was served on June 10, 2022 with a copy of Plaintiff's complaint. This Notice of Removal is filed prior to the expiration of 30 days from the date of service. See, 28 U.S.C. § 1446(b)(1); Murphy Bros., Inc. v. Michetti Pipe Stringing, Inc., 526 U.S. 344 (1999).

4. This Court has federal question subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1331 as the civil action arises under Chapters 42 and 20 of the United State Code.

5. The claims against Morgan A. Seto, Stanley Seto, and Lorraine Cesere Seto are severable. As of this filing, no return of service has been filed by Plaintiff showing service on these remaining Defendants.

6. Venue is proper in this Court pursuant to 28 U.S.C. § 1441(a) because the State Court Action is pending in Massachusetts.

7. This Notice of Removal has been served on Plaintiff's counsel. A Notice of Filing of Notice of Removal, attached hereto as Exhibit 2, will be filed in the Suffolk Superior Court upon the filing of this Notice of Removal.

**WHEREFORE**, the City of Boston hereby removes the above-captioned case from the Suffolk Superior Court Department of the Trial Court for the Commonwealth of Massachusetts and requests that further proceedings be conducted in this Court as provided by law.

Date: June 13, 2022

Respectfully Submitted,

**CITY OF BOSTON**

By its attorneys:

ADAM CEDERBAUM  
Corporation Counsel

/s/ Nieve Anjomi  
Nieve Anjomi (BBO#651212)  
Senior Assistant Corporation Counsel  
City of Boston Law Department  
City Hall, Room 615  
Boston, MA 02201  
(617) 635-4098  
[nieve.anjomi@boston.gov](mailto:nieve.anjomi@boston.gov)

/s/ Mauricio J. Vaca  
Mauricio J. Vaca (BBO#: 704470)  
Sebastian Derian (BBO# 706819 )  
Assistant Corporation Counsels  
Boston Public Schools  
2300 Washington Street, 4th Floor  
Boston, MA 02119  
(617) 635-9320  
[mvaca@bostonpublicschools.org](mailto:mvaca@bostonpublicschools.org)  
[sderian@bostonpublicschools.org](mailto:sderian@bostonpublicschools.org)

**Certificate of Service**

I hereby certify that a true and correct copy of the above document was served upon  
Plaintiff by email at the following address on June 13, 2022:

Carmen L. Durso, Esq.  
Law Office Carmen L. Durso  
175 Federal St, Suite 505  
Boston, MA 02110  
[carmen@dursolaw.com](mailto:carmen@dursolaw.com)

/s/ Nieve Anjomi  
Nieve Anjomi